

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
U.S. DISTRICT COURT  
SEP -2 P 12:14

UNITED STATES

V.

CR. NO. 04-10202-RWZ

EARL DICKERSON

AMENDED MOTION FOR RECONSIDERATION OF ORDER OF DETENTION AND  
PROPOSED CONDITIONS OF RELEASE

Defendant Earl Dickerson, by his attorney, moves that this Court reconsider its prior order of detention and release him on the following terms and conditions.

This Court previously ordered defendant's detention with leave to move for reconsideration when the defendant was prepared to present information to support his release.

CONTEXT FOR RELEASE:

Mr. Dickerson, age 30, resided at the time of his arrest with his mother, Janet Royston, 9 Westcott Street, Dorchester, Massachusetts.

Ms. Royston is the owner of the two family residence at 9 Westcott Street. The property has an assessed market value of approximately \$450,000.00 and is encumbered by a first mortgage in the approximate amount of \$130,000.00. Ms. Royston is prepared to grant a mortgage to the government to be held in escrow as surety for her son's release. Ms. Royston is employed as a school bus driver for the City of Boston.

Ms. Royston requests that her son be permitted to reside with her in the family home at 9 Westcott Street.

At the time of Mr. Dickerson's arrest on the federal charge, and the time of the initial filing of the motion for reconsideration, state criminal charges were pending in the Dorchester

District Court against Ms. Royston arising out of the initial search of her home by Boston Police which resulted in the state arrest of Mr. Dickerson and the subsequent federal indictment. On August 9, 2004, the complaint against Ms. Royston was dismissed at the request of the Suffolk County District Attorney's Office.

When interviewed by the pretrial services officer, Mr. Dickerson indicated a willingness to participate in drug treatment (in patient or otherwise) and/or drug testing.

**PROPOSED CONDITIONS OF RELEASE:**

Appearance bond in an amount to be secured by the property at 9 Westcott Street, Dorchester, Massachusetts;

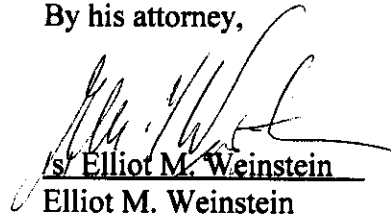
Maintain residence with mother at 9 Westcott Street, Dorchester, Massachusetts;  
(Alternatively, home confinement and electronic monitoring at 9 Westcott Street, Dorchester, Massachusetts;)

Drug testing and/or treatment as requested by pretrial services office;

Abide by all statutory and other court ordered conditions of release.

**EARL DICKERSON**

By his attorney,



**Elliot M. Weinstein**

**BBO #520400**

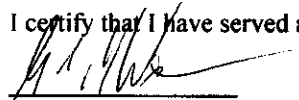
**228 Lewis Wharf**

**Boston, MA 02110**

**617-367-9334**

**CERTIFICATE OF RELEASE**

I certify that I have served a copy of the above on John Capin, AUSA and pretrial services office.

  
**Elliot M. Weinstein**